

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION

| | | |
|------------------------------|---|------------------------|
| In re | § | Chapter 11 |
| | § | |
| COMPUTE NORTH HOLDINGS, INC. | § | Case No. 22-90273 (MI) |
| <i>et al.¹,</i> | § | |
| | § | |
| DEBTORS. | § | (Jointly Administered) |

**NOTICE OF APPEARANCE, REQUEST FOR ALL NOTICES,
AND DEMAND FOR SERVICE OF PAPERS**

PLEASE TAKE NOTICE that Craig E. Power and Maria M. Bartlett appear as counsel for creditor MP2 Energy Texas LLC d/b/a Shell Energy Solutions (“Shell”) and hereby submit this notice of appearance in the above-captioned proceeding and request notice of all hearings and conferences herein and make a demand for service of all papers herein, including, but not limited to, papers and notices pursuant to Bankruptcy Rules 1009, 2002, 3017, 9007 and 9010 and § 342 (if applicable) of the Bankruptcy Code. All notices given or required to be given in this case shall be given to and served upon Craig E. Power and Maria M. Bartlett at the following address:

Craig E. Power
Maria M. Bartlett
COKINOS | YOUNG
Four Houston Center
1221 Lamar Street, 16th Floor
Houston, Texas 77010

PLEASE TAKE FURTHER NOTICE that the foregoing demand includes not only the

¹ The Debtors in these chapter 11 cases, along with the last four digits of each Debtor’s federal tax identification number, include: Compute North Holdings, Inc. (4534); Compute North LLC (7185); CN Corpus Christi LLC (5551); CN Atoka LLC (4384); CN Big Spring LLC (4397); CN Colorado Bend LLC (4610); CN Developments LLC (2570); CN Equipment LLC (6885); CN King Mountain LLC (7190); CN Minden LLC (3722); CN Mining LLC (5223); CN Pledgor LLC (9871); Compute North Member LLC (8639); Compute North NC08 LLC (8069); Compute North NY09 LLC (5453); Compute North SD, LLC (1501); Compute North Texas LLC (1883); Compute North TX06 LLC (5921); and Compute North TX10 LLC (4238). The Debtors’ service address for the purposes of these chapter 11 cases is 7575 Corporate Way, Eden Prairie, Minnesota 55344.

notices and papers referred to in the Bankruptcy Rules and sections of the Bankruptcy Code specified above, but also includes, without limitation, the schedules, statement of financial affairs, operating reports, any plan of reorganization or disclosure statement, any letter, application, motion, complaint, objection, claim, demand, hearing, petition, pleadings or request, whether formal or informal, whether written or oral, and whether transmitted or conveyed by mail, delivery, telephone, telegraph, telex or otherwise, whether or not filed with or delivered to the Bankruptcy Clerk, Court or Judge (as those terms are defined in Bankruptcy Rule 9001) in connection with and with regard to the above-referenced bankruptcy case and any proceedings related thereto.

PLEASE TAKE FURTHER NOTICE that Shell intends that neither this Notice of Appearance nor any later appearance, pleading, claim or suit shall waive (i) the rights of Shell to have final orders in non-core matters entered only after *de novo* review by a District Judge; (ii) the rights of Shell to trial by jury in any proceedings so triable in these cases or any case, controversy or proceeding related to these cases; (iii) the rights of Shell to have the District Court withdraw the reference in any matter subject to mandatory or discretionary withdrawal; or (iv) any other rights, claims, actions, defenses, setoffs, or recoupments to which Shell is or may be entitled under agreements, at law, in equity, or otherwise, all of which rights, claims, actions, defenses, setoff, and recoupments the undersigned expressly reserves on behalf of Shell.

Respectfully submitted,

COKINOS | YOUNG

By: /s/ Maria M. Bartlett

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**COUNSEL FOR CREDITOR MP2 ENERGY
TEXAS LLC D/B/A SHELL ENERGY
SOLUTIONS**

CERTIFICATE OF SERVICE

I hereby certify that on September 27, 2022, true and correct copies of the foregoing Notice of Appearance and Request for Service of Papers were served by the Court's Electronic Filing system.

/s/ Maria M. Bartlett
MARIA M. BARTLETT